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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Mar 28, 2016**

SEAN F. MCAVOY, CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

vs.

KEVIN BROADNAX, JR., (10),

Defendant.

15-CR-00144-SMJ-10

Protective Order Regulating  
Disclosure of Discovery and  
Sensitive Information Contained  
Therein

The United States of America, having applied to this Court for a protective order regulating disclosure of the discovery materials and the sensitive information contained therein (the “Discovery”) to defense counsel in connection with the Government’s discovery obligations, and the Court finding good cause therefore, **IT IS HEREBY ORDERED:**

1       1.     The United States' Motion for Protective Order Regulating Disclosure of  
2     Discovery and Sensitive Information is **GRANTED**.

3       2.     The United States is authorized to disclose the discovery and sensitive  
4     information materials (hereinafter "Discovery") in its possession pursuant to the  
5     discovery obligations imposed by this Court.

6       3.     Government personnel and counsel for Defendants shall not provide, or  
7     make available, the Discovery to any person except as specified in this Order or by  
8     approval from this Court. Therefore, defense counsel and the Government shall restrict  
9     access to the Discovery, and shall only disclose the Discovery to their client, office staff,  
10    investigators, independent paralegals, necessary third-party vendors, consultants, and/or  
11    anticipated fact or expert witnesses to the extent that defense counsel believes is  
12    necessary to assist in the defense of their client in this matter or that the Government  
13    believes is necessary in the investigation and prosecution of this matter.

14      4.     Third parties contracted by the United States or defense counsel to provide  
15    expert analysis or testimony may possess and inspect the Discovery, but only as  
16    necessary to perform their case-related duties or responsibilities in this matter. At all  
17    times, third parties shall be subject to the terms of this Order.

18      5.     Discovery in this matter will be made available to defense counsel via access  
19    to a case file on USA File Exchange. If necessary to review discovery with their  
20    respective clients, defense counsel may download the discovery and duplicate only once.  
21    Discovery materials may not be left in the possession of the defendants. In order to  
22    provide discovery to a necessary third-party vendor, consultant, and/or anticipated fact or  
23    expert witness, defense counsel may duplicate the discovery only once. No other copies  
24    shall be made, by defense counsel or the defendants, without prior approval from this  
25    Court.

26      6.     To the extent that defense counsel makes any portion of the Discovery  
27    available in paper format to anyone, including their clients, outside of counsel's office,  
28    defense counsel shall ensure that any and all sensitive information is redacted or

1 removed. Such redaction/removal shall include, but shall not be limited to, the following:

2 (a) all Social Security, identification card, driver's license, birth certificate, and taxpayer  
3 identification numbers; (b) all business and employer names, locations, addresses, as well  
4 as salary information; (c) residential and business addresses; (d) all dates of birth, organ  
5 donor information, telephone numbers, and email addresses; (e) all lease, bill, or other  
6 payment amounts; and (f) all information identifying the contents and routing and  
7 account number(s) of any financial account, including bank, trust, and retirement  
8 account(s).

9 7. All counsel of record in this matter, including counsel for the United States,  
10 shall ensure that any party, including the defendants, that obtains access to the Discovery  
11 is provided a copy of this Order. No other party that obtains access to or possession of  
12 the Discovery shall retain such access or possession unless authorized by this Order, nor  
13 further disseminate the Discovery except as authorized by this Order. Any other party  
14 that obtains access to, or possession of, the Discovery once the other party no longer  
15 requires access to or possession of the Discovery shall promptly destroy or return the  
16 Discovery once access to Discovery is no longer necessary. For purposes of this Order,  
17 "other party" is any person other than counsel for the United States, counsel for  
18 defendants, or the defendants.

19 8. All counsel of record, including counsel for the United States, shall keep a  
20 list to identify each person to whom the Discovery is disclosed and who was advised of  
21 the requirements of this Order. Neither counsel for each of the defendants, nor the  
22 counsel for the United States, shall be required to disclose this list of persons unless so  
23 ordered to do so by the Court.

24 9. Upon entry of a final order of the Court in this matter and conclusion of any  
25 direct appeals, government personnel and counsel for defendants shall retrieve and  
26 destroy all copies of the Discovery, except that counsel and government personnel may  
27 maintain copies in their closed files following their customary procedures.  
28

**DATED** this 28th day of March 2016.

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